



Clay County, Missouri

County Administrator
Administration Building
10 Courthouse Square ~ Liberty, MO 64068

Alexa Barton, CPPB, C.P.M.
County Administrator

December 15, 2006

KC ICON Design-Build Project Team
Missouri Department of Transportation
600 NE Colbern Road
Lees Summit, MO 64086

Letter and attachment e-mailed to:
kcICON@modot.mo.gov
kcrivercrossings.org

To Whom It May Concern:

7A Enclosed please find where Clay County has expressed, via approval of Resolution 2005-414, "Approve Support for the Missouri Department of Transportation to Construct a Separated Multi-Use Pedestrian Transportation Connector on any New Paseo Bridge". This Resolution was approved by the Clay County Commission October 11, 2005.

Clay County is in full support of this endeavor.

Thank you for your consideration and should you have any questions or concerns, please do not hesitate to contact my office.

Regards,

A handwritten signature in cursive script that reads "Alexa Barton".

Alexa Barton
Clay County Administrator

AB/reb

Cc: Steve Rhoades
srhoades@MARC.org

Enc.

TEL 816.407.3620
FAX 816.407.3601

abarton@claycogov.com
www.claycogov.com

RESOLUTION
OF THE CLAY COUNTY COMMISSION
CLAY COUNTY, MISSOURI

ATTEST A TRUE COPY
PAMELA S. MASON, CLERK
CLAY COUNTY COMMISSION
BY *Manette*
DEPUTY CLERK

2005-414

**APPROVE SUPPORT FOR THE MISSOURI DEPARTMENT OF
TRANSPORTATION TO CONSTRUCT A SEPARATED MULTI-USE PEDESTRIAN
TRANSPORTATION CONNECTOR ON ANY NEW PASEO BRIDGE**

BE IT HEREBY RESOLVED BY THE COUNTY COMMISSION OF CLAY COUNTY, MISSOURI THAT, this Commission hereby approves the attached documentation expressing support for the Missouri Department of Transportation to construct a separated multi-use pedestrian transportation connector as part of any new Paseo Bridge; and directs the County Clerk to forward to each member of the Missouri Highways and Transportation Commission and to the District Engineer of District 4 of the Missouri Department of Transportation this resolution once approved. The Presiding Commissioner is authorized to sign the attached contracts (if applicable) and documents to facilitate this order.

ADOPTED BY THE COUNTY COMMISSION OF CLAY COUNTY, MISSOURI, THIS 11 DAY
OF October, 2005.

APPROVED AS TO FORM AND LEGALITY:

Robert Cook
COUNTY COUNSELOR

ATTEST: *Pamela S. Mason*
COUNTY CLERK

BY: *Shirley Duggitt*

Carol McCash
PRESIDING COMMISSIONER

Larry Lawrence
WESTERN COMMISSIONER

raig F. Otter
EASTERN COMMISSIONER

2005 4 1 4

Expressing support for and urging the Missouri Department of Transportation to construct a separated multi-use pedestrian transportation connector as part of any new Paseo Bridge; and directing this resolution be forwarded to each member of the Missouri Highways and Transportation Commission and to the District Engineer of District 4 of the Missouri Department of Transportation.

WHEREAS, the Missouri Department of Transportation is preparing an I-29/I-35 Environmental Impact Statement & Location Study regarding the improvement or replacement of the Paseo Bridge; and

WHEREAS, the Missouri Department of Transportation has budgeted \$195 million for such improvement; and

WHEREAS, U.S. Senator Kit Bond secured an additional \$50 million in federal funds for such improvement, to insure that it is a Signature Landmark transportation facility; and

WHEREAS, no Missouri River bridge in the Kansas City metropolitan area has a separated multi-use pedestrian transportation connector; and

WHEREAS, no funding is currently available for construction of a separated multi-use pedestrian transportation connector on any bridge other than the Paseo Bridge; and

WHEREAS, all comparable new bridges built in Missouri and in the United States in the last 20 years have included a separated multi-use pedestrian transportation connector; and

WHEREAS, pedestrian transportation connectors have consistently been ranked as one of the highest priorities by the citizens of the Kansas City region; and

WHEREAS, a separated multi-use pedestrian transportation connector on the Paseo Bridge will promote sustainable economic development via urban revitalization, regional tourism, and enhanced quality of life; and

WHEREAS, a separated multi-use pedestrian transportation connector on the Paseo Bridge, as such, will be highly beneficial to the citizens and the economy of the Kansas City region; NOW, THEREFORE,

BE IT RESOLVED:

Section 1. The Missouri Department of Transportation is urged to construct a separated multi-use pedestrian transportation connector as part of any new Paseo Bridge.

Section 2. This resolution is directed to be forwarded to each member of the Missouri Highways and Transportation Commission and to the District Engineer of District 4 of the Missouri Department of Transportation.

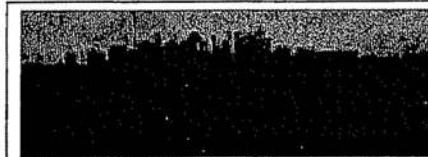
Contacts: Brent Hugh, Executive Director
Missouri Bicycle Federation, Inc.
5916 Arlington Ave
Raytown, MO 64133
816-356-1740, director@MoBikeFed.org

Christi Lynne, President
Greater Kansas City Bicycle Federation, Inc.
PO Box 411661
Kansas City MO 64141
816-221-2045, board@kcbikefed.org

Paseo Bridge Pedestrian/Bicycle-Transportation Fact Sheet

In recent weeks over 200 citizens have written MoDOT in support of providing pedestrian and bicycle-transportation accommodations on the proposed Paseo Bridge update.

The proposal is for a separated pedestrian/bicycle-transportation facility as part of the new Paseo Bridge, a facility that would interface with the existing street transportation network on each side of the bridge.

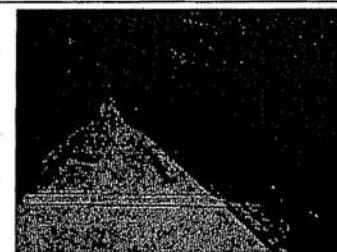


Despite the lack of proper facilities, there is still strong demand for pedestrian and bicycle-transportation access across the Missouri River in the Kansas City region—as this pedestrian, crossing on the southbound

However, MoDOT has indicated that citizen request is not enough. MoDOT needs to hear from area political leaders and civic groups requesting pedestrian and bicycle-transportation accommodation across the Missouri River.

Paseo Bridge Facts:

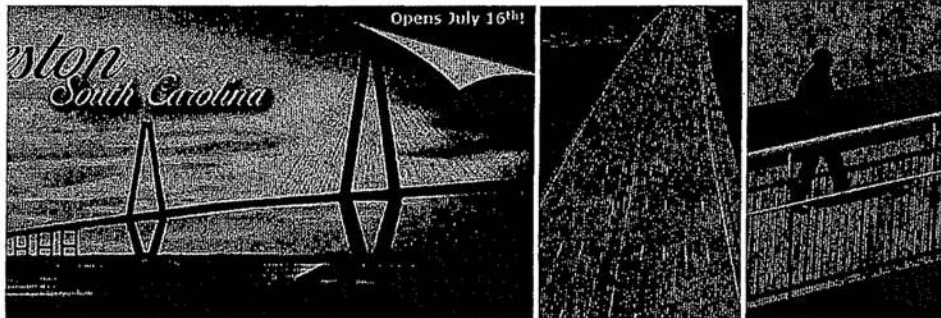
- ◆ No additional funds should be needed. MoDOT has a mandate to provide pedestrian and bicycle-transportation connectivity on every new project. A small portion of the \$50 million earmarked to make the Paseo Bridge a "Signature Bridge" can cover all needed expenses.
- ◆ No signature bridge (including interstate freeway bridges) built in the U.S. in recent decades has omitted pedestrian/bicycle-transportation accommodation.
- ◆ No bridge in the region currently provides safe pedestrian access across the Missouri River.
- ◆ A river crossing is called for in city, state, and regional plans. The Paseo Bridge is funded (\$245 million) and may be the only opportunity to provide a pedestrian crossing of the river in the next 25 years.
- ◆ St. Louis has no less than 5 pedestrian/bicycle-accessible crossings of the Missouri River and Mississippi River: Page Avenue Bridge, Chain of Rocks Bridge, Eads Bridge, McKinley Bridge, Lewis and Clark Bridge, and Highway 360 Bridge.
- ◆ Every major river bridge planned and built in Missouri in recent years has included pedestrian and bicycle-transportation accommodations.
 - Missouri River: Lexington (Hwy 13), Boonville (Hwy 40), Hermann (Hwy 19, planned), Washington (Hwy 47, planned), and St. Louis (Page Avenue). Jefferson City has \$4 million towards a cantilevered bike/ped addition to their bridge.
 - Mississippi River: the new \$100 million Emerson Bridge in Cape Girardeau, the I-72 Bridge at Hannibal.



The new Page Avenue Extension (Hwy 364) crosses the Missouri River in the St. Louis area. Page Avenue is a controlled access multi-lane freeway. A separated pedestrian facility on the Paseo Bridge could look and function much like it does on Page Avenue.

Cooper River Bridge, Charleston, South Carolina

8 lanes plus 12-foot bicycle/pedestrian lane, 1546-foot span, opened July 16th, 2005



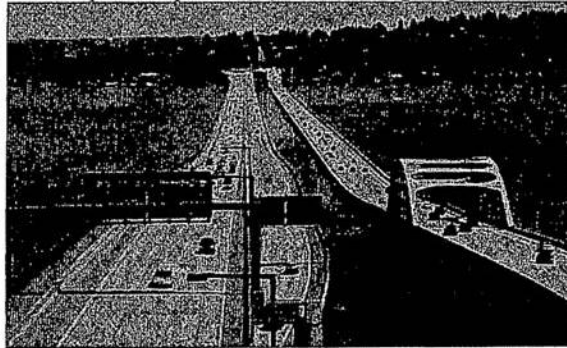
Letters, testimony, and even a local bumper sticker campaign worked to add a pedestrian/bicycle component into the bridge design.

The latest design plans include a 12 foot bicycle and pedestrian lane to be constructed along the ocean-side of the new bridge from Morrison Drive to Coleman Boulevard.

The bicycle/pedestrian lane travels along the outer edge of the bridge's tower piers and offers observation sites with benches to gaze out upon the beauty of the Charleston region.

Interstate 90 floating bridges across Lake Washington, Seattle

8 lanes plus bike/ped lane, 5,811 feet in length, opened 1989



Golden Gate Bridge, San Francisco

Four lanes plus two sidewalk/bicycle lanes, 1.7 miles in length



www.hakc.org



Housing Authority of
Kansas City, Missouri

December 15, 2006

Ms. Peggy Casey
Environmental Projects Engineer
Federal Highway Administration
3220 West Edgewood, Suite H
Jefferson City, Missouri 65109

Mr. Kevin Keith,
Chief Engineer
Missouri Department of Transportation
P.O. Box 270
Jefferson City, Missouri 65102

RE: I -29/35 Paseo Bridge Corridor – Final EIS

Dear Ms. Casey and Mr. Keith:

Thank you for providing the Housing Authority of Kansas City, Missouri (HAKC) with a copy of the Final Environmental Impact Statement for the I -29/35 Paseo Bridge Corridor.

As you are aware, this project will have a substantial environmental impact on the three public housing developments of Guinotte Manor, Riverview Gardens, and Chouteau Courts which are adjacent to the public right-of-way which is the subject of this study. Together these three developments provide housing for 587 families. The total population is in excess of 1,500. The residents of these developments are primarily minority. The average family income is considered extremely low – under 20% of area median income.

Over the past ten years we have invested over \$44 million in HUD HOPE VI and capital funding for the complete renovation of these three developments. It is imperative that this public investment be preserved and the developments properly maintained as housing assets for extremely low-income families.

We were pleased to find that some of the concerns we expressed in our letter of May 22, 2006 regarding the draft EIS were acknowledged and responded to in the final version. However, we have remaining concerns in the four environmental areas we cited previously:

301 E.Armour Blvd.
Kansas City, MO 64111-1252

OFFICE
(816) 968-4100

TELETYPE-DEAF USERS
(816) 968-4106

FAX
(816) 968-4110

1. **Air Quality** – This is our primary concern in regard to the environmental impact of this project. Many of our residents suffer from asthma and other respiratory illnesses. We stated in our May 22, 2006 letter regarding the draft EIS, that the potential impact on air quality of this project was not sufficiently addressed, and we inquired as to whether there will be a significant decline in air quality.

8A

MoDOT's reply in the Final EIS is that "a hot spot air quality analysis was not required", and "typically hot spot analysis is only done when there is significant delays and idling. In general, the Preferred Alternative would reduce delays and idling that exist currently." (Comment Code 12A, page V-198).

In the EIS narrative you explain that traffic flow will be improved by adding lanes to the downtown loop. It is our understanding that Alternative A is MoDOT's Preferred Alternative. Plate A-06 of the Preferred Alternative illustrates changes at the northeast corner of the downtown loop. *There appear to be no substantive changes in the management of traffic entering the loop from the Corridor going south.* There is still only one lane branching onto I-70 on the east side of the loop, and only one lane branching onto I-70/35 on the north side of the loop. This stricture is currently the primary cause of idling and delays in the corridor during morning rush hour.

Because there are not changes at these critical points, it is our contention that morning rush hour traffic will continue to experience delays and idling at this location, and that this situation will potentially be worsened by adding additional bridge lanes bringing increased traffic flow which must be funneled through the same two lanes that are now the primary factor in congestion at this location. *With no planned relief for this added traffic pressure going south, additional bridge lanes thus become a larger parking lot for idling cars creating additional fumes.*

Conclusion: Given the potential public health consequences at this location between three public housing developments, we believe the Environmental Impact Study is incomplete without a full air quality analysis.

Furthermore, because this area at the northeast corner of the downtown loop is likely to experience greater idling and delay during morning rush hour than any other portion of the corridor addressed by this study, we believe the Preferred Alternative will have a disproportionately adverse impact on air quality for the low-income families occupying the three public housing developments at this location.

2. **Sound** – We remain concerned about noise impact, however we understand that there will be opportunities for additional public input during the design process, and that a final Noise Report will be prepared by MoDOT if needed. During the design process we will want to carefully assess the aesthetics and effectiveness of

8B

any proposed abatement measures with the input of our tenant associations at the Chouteau Court and Guinotte Manor developments.

3. **Vibration** – We also remain concerned about vibration, whether it is the continuous vibration of the roadway, or the acute vibration associated with drilling, blasting, and heavy equipment used during construction. With regard to continuous vibration, you state that resurfacing old pavement will help reduce vibrations. While this may be true, *there is not sufficient documentation and analysis in the Final EIS for us to arrive at the conclusion that this project will reduce, or at least not increase continuous vibration.* Unlike the discussion of sound abatement measures, there is no analysis and recommendation of specific grading and pavement techniques directed at reducing vibration.

- 8C *Please be aware that vibration is an on-going health and maintenance concern, and we would appreciate acknowledgement of this concern during the design and engineering stage.* We also expect that MoDOT and its contractors will contact us so that we may provide sufficient notice to our residents prior to drilling and blasting.

We ask that your engineers bear in mind that, due to sub-soil conditions, the structural integrity of the Chouteau Court development may be threatened by any substantial construction vibrations. In recent years we have experienced differential settling of building foundations, and the random appearance of sink holes. This process could be accelerated by construction vibration.

4. **Traffic Patterns and Neighborhood Accessibility** – We appreciate MoDOT's responsiveness this past year in considering the concerns of area residents regarding the use of Independence Avenue, and in preserving Troost as an entrance into Columbus Park so that the Troost bus route may be maintained for Guinotte public housing residents without cars.

Unfortunately, the Preferred Alternative presents a substantial change in neighborhood access that affects all three of our public housing developments.

- 8D *The proposed closing of the Admiral exit blocks the primary access point into the neighborhood for residents traveling north on I-35, I-70, or US 71 (Bruce R. Watkins Drive).*

Many neighborhood residents when coming from the south and exiting will cross Admiral and continue to Independence Avenue, then turn left to go to Columbus Park and the Guinotte Manor development, or turn right and go to either the Chouteau Courts or the Riverview public housing developments. The Kansas City University of Medical and Biological Sciences shares our concern as both their students and faculty depend on this exit.

The Admiral exit also provides an important pressure relief valve for the east side of the downtown loop. Cars backed up at this location may exit and easily take a different route north over the Heart of America or Broadway bridges.

Conclusion: Due to the importance of the Admiral exit as a community entrance, MoDOT needs to maintain the exit, or develop a reasonable alternative.

Please let us know how MoDOT intends to address our remaining concerns in regard to air quality, sound, vibration, and neighborhood access. We look forward to working with MoDOT through the design, engineering, and construction process so that the needs and concerns of our residents are addressed, and they do not bear a disproportionate share of the environmental impact.

Sincerely,


Edwin T. Lowndes,
Executive Director

CC:

Jeffrey K. Lines, Special Master for HAKC
Joe Egan, Chairman, HAKC Board of Commissioners
State Senator Charles Wheeler
Mayor Kay Barnes
Mike Sturgeon
Deborah White
Martha Allen
Julie Levin



December 15, 2006

I-29/I-35 Final EIS and Location Study
c/o HNTB
715 Kirk Drive
Kansas City, MO 64105

Dear Sir or Madam:

We are pleased to be afforded the opportunity to submit comments in response to the Final Environmental Impact Study (FEIS) for the I-29/I-35 Corridor. This letter and attachment represent a collaborative effort among the Regional Transit Alliance (RTA), Downtown Council of Kansas City (DTC), American Institute of Architects – Kansas City (AIA-KC) and Kansas City Design Center (KCDC).

Last spring, our four organizations submitted a joint written response to the Draft Environmental Impact Statement (EIS). Our comments also reflected consultations and collaboration with the Northland River Crossing Committee and North Kansas City Chamber of Commerce, and included a detailed technical analysis by Glatting Jackson Kercher Anglin, a nationally distinguished transportation engineering firm noted for its expertise in context-sensitive solutions.

We have continued our engagement on this proposal by working with the private and public sectors, and have appreciated the opportunity to be represented on the kciCON Community Advisory Group.

We are pleased that MoDOT and FHWA have made explicit, meaningful commitments to provide bicycle and pedestrian facilities in the corridor. We are disappointed, however, in the failure of either agency to take our other recommendations seriously. MoDOT and FHWA have appropriated much of the language of our recommendations in the FEIS without actually incorporating the substance of those suggestions into the actions proposed for this corridor.

For example, the FEIS has restated the purpose and need as “efficiently and safely mov[ing] people, goods and service from north and south of the river”, (FEIS, p.S-2), words that echo our written responses to the Draft EIS. We believe the DEIS more accurately reflects the actual project objectives, which remain focused primarily on “add[ing] vehicular capacity and improv[ing] safety consistent with best design practices” (DEIS, “Purpose and Need”, p. S-2).

Regional Transit Alliance, Downtown Council, American Institute of Architects – Kansas City,
and Kansas City Design Center

Joint Response to the Final Environmental Impact Statement
for the Interstate 29/35 Paseo Bridge Corridor

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In sum, MoDOT and FHWA have not provided sufficient meaningful consideration or adoption of our suggestions for a multi-tiered approach to a total transportation solution for the corridor.

The Glatting Jackson report, which we submitted as part of our written response to the DEIS, focuses on two central issues. First, it provides a detailed analysis of the likely consequences of the proposed highway widening on traffic circulation and access, along with urban design and environmental justice issues throughout the corridor. Second, it proposes viable alternative actions, such as travel demand management (TDM), transportation systems management (TSM), and the incorporation of public transit and bicycle and pedestrian strategies that do not entail the dramatic adverse impacts of adding multiple lanes of traffic to this dense urban corridor.

In four separate instances within the FEIS, MoDOT and FHWA dismiss these proposed alternatives as “social engineering” and describe them as “hypothetical solutions” that “have not been supported by a majority of the public”.¹

In adopting such a tone, MoDOT and FHWA have reinforced their failure to adopt a more progressive, comprehensive transportation strategy for the corridor. We have offered viable alternatives that can “efficiently and safely move people, goods and services” while enabling transportation choices that are more sensitive to the physical character of the city and the integrity of urban neighborhoods, more energy-efficient, less likely to harm air quality, and more likely to enhance the future growth potential and economic competitiveness of the metropolitan area. We disagree strongly with MoDOT and FHWA’s contention that such a comprehensive strategy is not “supported by a majority of the public.”

On November 7, 2006, nearly 74,000 voters in Kansas City, Missouri provided overwhelming support for a ballot initiative to create a light rail transit corridor connecting the southeastern suburbs through the urban core to the Northland and KCI Airport. As evidenced by the election outcome in Clay and Platte Counties, where voters cast nearly 25,000 “Yes” votes,² even suburban residents who might be perceived as having a “regional, Midwestern preference for personal vehicle commuting and travel”³ voted decisively to pass the initiative.

Clearly, Kansas Citians in all corners of the city want choices in how they travel, and expect local government, public leaders and public agencies to take the steps necessary to implement the vision of a future city built on viable transportation alternatives.

¹ Chapter V, FEIS, “Comments and Coordination,” pp.V-209, V-211, V-214, V-215.

² The votes in favor of passage were distributed as follows: Clay County: 16953 Yes, 16016 No; Platte County: 7722 Yes, 6434 No; Kansas City: 49309 Yes, 43884 No; Clay County: 14 Yes, 10 No. Vote totals obtained from the Kansas City Election Board, Cass County Election Board, Platte County Election Board, and Clay County Election Board.

³ MoDOT/FHWA Response to Comment 15J, Chapter V, FEIS, p.V-209.

Regional Transit Alliance, Downtown Council, American Institute of Architects – Kansas City,
and Kansas City Design Center

Joint Response to the Final Environmental Impact Statement
for the Interstate 29/35 Paseo Bridge Corridor

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We believe that MoDOT and FHWA can satisfy our concerns in a very simple way: by providing the following concrete commitments and assurances to ensure that the Record of Decision appropriately balances the travel demands in the corridor with the environmental, aesthetic, economic, and social factors protected by the federal environmental impact process.

- 9A • **MoDOT should commit to creating an iconic bridge as a landmark structure for the region.** The R.O.D. should include a detailed commitment by MoDOT and FHWA to assign evaluation points to the Community Advisory Group for aesthetic components of the bridge design, as described by Director Pete Rahn at the December 1, 2006 meeting of the Missouri Highways and Transportation Commission in Kansas City. This commitment should articulate the weighting of points and the process for providing public input and feedback on the proposed designs, as well as commit MoDOT to accepting the Advisory Group's recommendations on this issue.
- 9B • **The CBD North Loop Subcorridor must be excluded from the Final Environment Impact Statement and Record of Decision.** We believe the consequences of the proposed actions have not been adequately evaluated, and recommend that MoDOT and FHWA undertake appropriate analysis of the traffic, economic, and aesthetic impacts of the proposed changes as part of the I-70 EIS process. We have provided a more detailed explanation of our concerns in Attachment A, "Evaluation of MoDOT's Preferred Alternatives for the RIVER CROSSING SUBCORRIDOR (14th Avenue to Dora Street)."
- 9C • **MoDOT and FHWA should prohibit the Design-Build contractor from proposing a total closure of the Paseo Bridge, and commit to developing a traffic and construction management plan to minimize adverse consequences of construction on access to homes, businesses, and recreational areas.** We applaud MoDOT's commitment to develop maintenance of traffic plans for the construction phases, but are extremely concerned about the likely disruptions and economic consequences of even a short-term total closure of the existing bridge. We also feel that MoDOT has undertaken inadequate analysis of the traffic and long- and short-term economic impacts of the proposed closure.
- 9D • **MoDOT's commitment to develop an appropriate context-sensitive design for the corridor (FEIS, H.18, p.S-24) should include funding of urban design enhancements and participation by the public and the kcICON Community Advisory Group in the evaluation of aesthetic treatments for the corridor.** FHWA has called for all states to implement context-sensitive solutions (CSS) on a project level by September 1, 2007. As described in the FHWA-authored report, *Flexibility in Highway Design*,⁴ context-sensitive solutions "incorporate community values and are safe, efficient, effective mechanisms for the movement of people and goods." MoDOT has committed only to "work with the appropriate city governments and stakeholders to develop a context

⁴ <http://www.fhwa.dot.gov/environment/flex/index.htm>.

Regional Transit Alliance, Downtown Council, American Institute of Architects – Kansas City,
and Kansas City Design Center

Joint Response to the Final Environmental Impact Statement
for the Interstate 29/35 Paseo Bridge Corridor

Page 4 of 6

sensitive urban design approach”, and continues to avoid any commitment to fund or maintain such improvements (FEIS, “H.18. List of Commitments,” “Summary,” p.S-24).

- 9E • **MoDOT and FHWA should commit to implementing light rail, bus rapid transit (BRT) and other modes of public transit to mitigate traffic congestion and air quality issues in the corridor.** Again, MoDOT and FHWA have proposed only to “coordinate” such activities with local agencies “separate from this NEPA document”. In light of the outcome of the recent Kansas City ballot initiative, and clear and convincing public support for developing such alternatives, we find this position unacceptable.
- 9F • **MoDOT and FHWA should commit to implementing high-occupancy vehicle (HOV) lanes as a means for mitigating traffic congestion and air quality issues in the corridor.** MoDOT has proposed only to “coordinate” future implementation of HOV lanes in conjunction with widening the I-29/I-35 mainline beyond 6 lanes (FEIS, “Summary,” p.S-24). We believe that future widening of the roadway will induce new traffic into the corridor, and therefore require appropriate offsetting measures to avoid reaching traffic gridlock again within several years.
- 9G • **MoDOT and FHWA should commit to developing transportation systems management (TSM) and travel demand management (TDM) plans to reduce congestion on the Downtown Loop and in the corridor.** As mentioned above, we spent considerable time, money and effort in proposing workable alternatives that would avoid the endless cycle of highway capacity increases that have plagued many suburban and auto-dependent communities. We believe it is reasonable, prudent, and cost-effective for MoDOT to develop TDM and TSM plans that would divert through traffic away from the project corridor, by measures as simple as directing through interstate traffic not destined for the downtown loop or project corridor onto other segments of the regional interstate system, such as I-635 in Kansas and I-435 in Missouri.

Unfortunately, MoDOT and FHWA have provided no concrete assurances that any of these recommendations will be considered or implemented. In the FEIS Summary, MoDOT and FHWA only go so far as to argue that TSM and TDM strategies are not “precluded by” the proposed actions (p.S-10). This is far short of a commitment to actively employing alternative strategies that should help to provide a long-term solution meeting the purpose and need.

Our region is facing transportation choices that will have profound impacts on how and whether Kansas City’s urban renaissance is able to flourish. Our position is fairly straightforward: Kansas City deserves sound investments in sustainable transportation solutions. MoDOT can continue widening and expanding the interstate system *ad infinitum*, or begin more thoughtful planning of transportation alternatives that respect sense of place; provide access to jobs, entertainment, and places of residence; promote quality of life and pedestrian safety; preserve the environment and promote public health.

Regional Transit Alliance, Downtown Council, American Institute of Architects – Kansas City,
and Kansas City Design Center

Joint Response to the Final Environmental Impact Statement
for the Interstate 29/35 Paseo Bridge Corridor

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These comments represent our shared concerns about the FEIS. We would like to thank
MoDOT and FHWA for this opportunity to provide comments on behalf of our constituents.
We stand ready to help MoDOT develop smarter transportation solutions that will create a
greater city for the next century.

Thank you,

Greg Lever
Executive Director, RTA

William Dietrich
President & CEO, DTC

Dawn Kirkwood
Executive Director, AIA-KC

Daniel Serda, Ph.D.
Executive Director/CEO, KCDC

cc: Distribution

Attachment

Regional Transit Alliance, Downtown Council, American Institute of Architects – Kansas City,
and Kansas City Design Center

Joint Response to the Final Environmental Impact Statement
for the Interstate 29/35 Paseo Bridge Corridor

Page 6 of 6

Distribution:

Governor Matt Blunt
U.S. Senator Jim Talent
U.S. Senator Christopher “Kit” Bond
U.S. Congressman Emanuel Cleaver II
U.S. Congressman Sam Graves
Mayor Kay Barnes, City of KCMO
Mayor Gene Bruns, City of North KCMO
Members of the City Council, City of KCMO
Allen Masuda, FHWA
Andrew L. Boeddeker, U.S. Dept. of Housing and Urban Development
Beth Wright, District Engineer, MoDOT
Brent Hugh, Missouri Bike Federation
Carol Legard, Advisory Council on Historic Preservation
Charles M. Scott, U.S. Dept. of the Interior, Fish and Wildlife Service
Chris Carucci, Downtown Council
Darby Trotter, River Front Heritage Trail
David Warm, Mid America Regional Council
Dick Jarrold, KCATA
Mayor Kay Barnes, KCMO
Ernest Quintana, U.S. Dept. of the Interior, National Park Service
Fred Skaer, FHWA
James B. Gulliford, U.S. Environmental Protection Agency
Jonathan Kemper, Commerce Bank
John Yacos, JE Dunn
Kite Singleton, E. Crichton Singleton
Lee Ann Kell, MoDOT
Mark Huffer, KCATA
Mark McDowell, Chairman, RTA
Mell Henderson, Mid America Regional Council
Mike Burke, King Hershey
Mike Sturgeon, Columbus Park Neighborhood
Missouri Department of Natural Resources, State Historic Preservation Office
Vince Gauthier, Executive Director, Port Authority of Kansas City
Pete Rahn, MoDOT
Reeves Wiedeman, Helix
Robert Smith, Department of the Army
Stan Harris, City of KCMO
Steve Taylor, Chairman, DTC
Tim Kristl, Northland Chamber of Commerce
Tom Coyle, City of KCMO
Warren Erdman, Kansas City Southern
Wayne Cauthen, City Manager, City of KCMO

ATTACHMENT A.
Evaluation of MoDOT's Preferred Alternative for the
RIVER CROSSING SUBCORRIDOR (14th Avenue to Dora Street)

MoDOT/FHWA FEIS Preferred Alternative: Alternative A

The CBD North Loop Subcorridor must be excluded from the Final Environment Impact Statement and Record of Decision. MoDOT and FHWA have failed to provide sufficient explanation and properly evaluate the associated traffic and environmental impacts associated with the proposed actions.

In the DEIS, MoDOT and FHWA proposed altering this Subcorridor through a combination of road widening, ramp and lane modifications, ramp closures, interchange conversion, and re-configuration of existing entrance and exit ramps. Due to a lack of thorough analysis, as well as significant concerns about the likely traffic impacts of the proposed closures and reduction of access to and from the downtown street network associated with the proposed changes, we asked MoDOT and FHWA either to undertake further analysis or to eliminate the Subcorridor from the FEIS altogether (Comment 15B, Ch. V, FEIS, "Comments and Coordination", p. V-113).

The FEIS differs from the DEIS only in that Alternative A is now specified as the Preferred Alternative. The agency response to our recommendation (MoDOT/FHWA Response to Comment 15B, FEIS, pp.V-205 and V-206) reiterates the rationale for the proposed changes without providing any further analysis of the consequences of the proposed action.

9H

Our DEIS comments also noted that the proposed CBD North Loop Subcorridor changes cannot be implemented as part of the Paseo Bridge project due to a lack of available funding, which MoDOT and FHWA have acknowledged in their response. MoDOT and FHWA nonetheless urge that the Subcorridor "should continue to be a part of this NEPA process so that as funding becomes available the project can be moved forward" (MoDOT/FHWA Response to Comment 15B, FEIS, p.V-206). This is an inadequate rationale for including the Subcorridor in the Record of Decision, and seems intended to circumvent NEPA and CEQA requirements that MoDOT and FHWA undertake a "hard look" at the likely impacts of the proposed action.

As noted in the technical report accompanying our original comments, the Preferred Alternative also uses vague language that is not qualified. For example, Alternative A proposes "minor ramp and lane modifications to improve operations and safety", while Alternative B "includes ramp and lane modifications to improve operations and safety" (FEIS, Chapter II, Section 3b, p.II-10). There is no explanation to be found anywhere in the text of the FEIS of what constitutes "minor" ramp and lane modifications.

None of the proposed changes are described by the text of the DEIS or FEIS, and are depicted only crudely in the visual exhibits included in the documents. This makes it nearly impossible for a reasonable person to make an informed decision about the benefits or adverse consequences of these changes. The visual exhibits included in the FEIS (Plates A-05 through A-09 in Appendix C, "Alternative Plates") focus on the existing and proposed right-of-way associated with the contemplated changes ("Legend", Appendix C, FEIS), and do not adequately illustrate the proposed changes themselves.

ATTACHMENT A.
Submitted by the Regional Transit Alliance, Downtown Council,
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Furthermore, the proposed changes are shown only in a two-dimensional map view, although all would have significant three-dimensional (vertical) impacts on views, and would create new physical, psychological and functional barriers between the Central Business District and River Market, and reduce local and interstate access into and from the East Loop, Columbus Park, and Independence Boulevard corridor.

Finally, none of the traffic or economic consequences of the proposed actions, including ramp closures and interchange modifications, have been evaluated or analyzed by MoDOT and FHWA.

For these reasons, we urge MoDOT and FHWA to simply remove this Subcorridor from the FEIS. Since most of the affected Subcorridor is also part of I-70, we believe it would be more appropriate for the proposed changes to be evaluated and incorporated into any proposals currently being evaluated by MoDOT as part of the ongoing I-70 Environment Impact Study.

PROPOSED BROADWAY BOULEVARD INTERCHANGE CONVERSION

From the visual illustrations included in the DEIS and FEIS, (Plate A-08, Appendix C), it appears that the following changes will occur with the conversion of the Broadway interchange to a single-point urban interchange (SPUI):

1. Access from NB Broadway Blvd. to NB I-35/EB I-70 is eliminated.
2. Access from NB Broadway Blvd. to WB I-70 is eliminated.
- 91 3. Direct access from WB I-70/SB I-35 to Broadway Blvd./US 169 is eliminated.
4. Vehicles on EB I-70 seeking to travel north on Broadway Blvd./US 169 enter the SPUI from the right-hand lane, requiring that they weave across at least two lanes of traffic to continue north through the SPUI.

None of the details specified above are described or explained in the text of the DEIS or FEIS. It is possible that we have misinterpreted the documents, but only because MoDOT and FHWA have failed to describe the proposed changes in words. Furthermore, MoDOT and FHWA do not evaluate any of the traffic, access and circulation impacts of these proposed changes.

Based on these details, we have identified the following consequences of the proposed action:

1. Commuters who currently enter NB I-35/EB I-70 from NB Broadway Blvd. will be forced to seek alternative routes on the local street network to reach the Main St. interchange. This is likely to create peak-hour congestion on Main Street, and will divert traffic that currently travels on Broadway to major east-west streets (8th St., 9th St., 10th St., and 12th St.) in order to reach the Main St. Interchange.
2. Commuters who currently enter WB I-70 from NB Broadway Blvd. will be forced to seek circuitous alternative routes, such as entering SB I-35 at Broadway, exiting at 12th St., and traveling west on 12th St. through the West Bottoms to reach WB I-670, before finally reaching WB I-70 nearly four miles from the downtown loop. This will increase traffic volumes on both the indirect interstate routes and the downtown street network.

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3. Vehicles seeking to travel from WB I-70/SB I-35 to NB 169 or SB Broadway Blvd. will be re-directed to exit at Main St., and then travel approximately four blocks west on 5th St. This reduction of access points will increase traffic volumes on 5th Street, and may result in cascading traffic on other parts of the frontage road and local street network.

CLOSURE OF ADMIRAL BLVD. AND INDEPENDENCE BLVD. EXIT RAMPS

MoDOT has not provided any analysis of the traffic impacts of the proposed ramp closures from NB I-35 to US 24/Independence Avenue and I-70 WB at Admiral. While we agree that such changes may be warranted from a safety standpoint, we are concerned that MoDOT has failed to provide any evaluation of how these changes will affect traffic circulation and access on the associated interchanges. MoDOT justifies the proposed ramp closures due to the "short weave distances between the exit and entrance ramps at this location". MoDOT and FHWA also claim that "other access points are available nearby to accommodate individuals who desire to exit the Interstate system in this corner of the Loop" (FEIS, Chapter II – Alternatives, J.3. p.II-13).

9J

We respectfully disagree. The local street network and these exit ramps provide access into the part of the Central Business District now commonly referred to as the "East Loop", which is the site of a proposed 12-square block mixed-use redevelopment project that will include 600 to 800 housing units, a 550-employee corporate headquarters, and proposed federal office facilities that might house up to 2,000 federal workers. We are concerned that total closure of these ramps will create major bottlenecks for workers commuting to this emerging area of Downtown, as well as harm future efforts to promote development in this area.

CONCLUSIONS

It is imperative that MoDOT and FHWA carefully evaluate the likely traffic impacts associated with the changes being contemplated for the North Loop, and provide adequate analysis to make it possible for us to reach an informed decision on these proposed changes. We believe it would be extremely short-sighted for MoDOT to take the proposed actions without providing an appropriate analysis of the local and interstate traffic impacts, and developing an appropriate traffic and circulation plan in consultation with the City of Kansas City, Missouri. According to our communications with MoDOT and project engineers at HNTB, none of the land use changes or development proposed for the East Loop have been reflected in any of the traffic studies undertaken as part of this project.

Because MoDOT and FHWA have not satisfied our previous requests for an appropriate impact analysis, we urge MoDOT and FHWA to simply omit this Subcorridor from the Record of Decision until adequate funding sources have been identified to undertake the proposed changes. At that time, MoDOT and FHWA should undertake a separate, thorough environmental impact analysis of the proposed actions. Future consideration of this Subcorridor must include more engagement, consultation, and participation by the public and stakeholders to ensure that the resulting proposals appropriately reflect community goals and values.



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 HNTB
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October 17, 2006

Dear MoDOT,

The Kansas City Bicycle Club would like to thank MoDOT for listening to the concerns of the bicycle/pedestrian community and for committing to adding safe bicycle/pedestrian access on the Heart of America bridge and for including in the Paseo RFP, design requirements that can add bike/ped accommodation in the future. We would encourage you to continue this dialogue with the bike/ped community as both projects continues and to continue to work cooperatively with other appropriate stakeholders to further explore some of the crossings evaluated in the River Crossing Feasibility study as well as others.

10A

We strongly encourage MoDOT to complete the Heart of America bike/ped retrofit project immediately, before the main Paseo project starts. Currently conditions are not safe for pedestrians and bicyclists to cross the Heart of America bridge. If MoDOT is truly committed to safe travel for all citizens we need this retrofit finished now. We urge the use of creative ways to finance it which could include borrowing money from the local cities or other jurisdictions until it could be paid back after the Paseo project is finished

10B

Since MoDOT is designing the bridge to add bike/ped in the future we would like them to consider this idea. Since the bridge will be designed with 6 freeway lanes for use now, with the design to include 2 more lanes to be used at a later date. We would like MoDOT to use one of the extra lanes as a bike/ped lane now. That lane could later be converted to a motorized vehicle lane when it is needed 20 years or so later and the bike/ped lane added. We think this could be done for minimal cost.

This idea would maximize resources, reduce wasteful spending, promote safe travel and make the bridge design flexible to meet existing and future needs.

10C

MARC's TTPC recommended adding a bicycle/pedestrian representative to the Paseo Community Advisory Group. We would like for this to happen as we think the MoDOT idea of advisory committee meeting once or twice with the bike/ped community isn't enough. The bike/ped community needs to be engaged during the whole process along with transit and the public. Since we don't know what the design is at this point, it's important that this input continue throughout the process of building the bridge.

10D

Economic justice is an important consideration—required by federal law. Allowing low-income neighborhoods to connect to jobs throughout this corridor is an important function of the bridge. Omitting bike/ped access along the corridor means that these connections are not made for low-income workers who use a combination of walking, bicycling, and transit to get to work and back.

10E

For pedestrians and bicyclists, the corridor served by the Heart of America Bridge is not the same as that served by the Paseo. Many destinations that could be reached on foot/bicycle via a Paseo connection can't be reached by detouring to Heart of America. Providing bike/ped accommodations on the Heart of America is good and necessary but does not replace the need for bicycle and pedestrian facilities in the Paseo Corridor.

10F

MoDOT needs to include bike/ped considerations at the beginning of a project. These modes are important in our regional goals and objectives. Improving access for all transportation modes should be one of the purposes and goals of this, and every project.

The process MoDOT set up to evaluate the different proposals is flawed because its assumptions skew it to include only ideas to facility better and more motor vehicle traffic rather than better and more movement of people and goods.

Like rivers, freeways are significant impediments to bicycling and walking. The freeway itself creates



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a barrier that divides up the nearby neighborhoods and commercial areas into small pieces. Bicyclists and pedestrians cannot get from one piece to the next but motorists can by using the freeway itself.

For that reason, this project, and others like it, should include these considerations right from the start:

- Bicycle/pedestrian access along the freeway corridor. How are bicyclists and pedestrians going to reach the same destinations the motorists reach via the freeway?
- Bicycle/pedestrian access on cross-streets and at interchanges. How will bicyclists and pedestrians safely cross the interchanges? Are bicycle lanes or wide curb lanes included? Do they include "intersection slots"? Are sidewalks included on BOTH sides of the road? Are interchanges designed to be bike/ped friendly and accessible (ie, shorter curb radius, 90-degree intersections rather than ramps that are impossible for bikes/peds to cross)

Other cities have more than doubled their amount of bicycle and pedestrian commuting within ten years by concentrating efforts on creating better connectivity across major barriers like rivers, then working on better system connectivity to those new cross-river connections.

There are ways to solve these issues if all the organizations involved work together and think creatively. For the Kansas City area to meet it's transportation and economic goals we need to build safe bike/ped access immediately on the Heart of America bridge and we would encourage using the extra lanes on the Paseo for bike/ped until they are needed for motorists.

Thank you for letting us comment on these issues.

Best regards,
Laurie Chipman, advocate
Cheryl Cross, president